

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Victoria C. Giles

Plaintiff(s),

vs. LORI C. Petersen

EEOC & Robert Prokop,  
Prokop Insurance,  
Nationwide Insurance  
Karen Seymour of EEOC  
MINNEAPOLIS DISTRICT.

Case No. 22-cv-1483 SRN/JFD  
(To be assigned by Clerk of District Court)

DEMAND FOR JURY TRIAL

YES ☒

NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff Victoria C. Giles

Name Victoria C. Giles

Street Address 5518 Oak Glen RD.

County, City Hennepin, EDINA

State & Zip Code MINNESOTA, 55439

Telephone Number 952-250-4769

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 *EEOC of Minneapolis*

Name *EEOC of Minneapolis*

Street Address *330 South Second Avenue, Suite*

County, City *720, Minneapolis, MN 55401-2224*

State & Zip Code *Hennepin Minnesota, 55401-2224*

b. Defendant No. 2 *Karen Seymour of EEOC of Minneapolis*

Name

Street Address *330 South Second Avenue*

County, City *Suite 720, Minneapolis, MN*

State & Zip Code *55401-2224*

c. Defendant No. 3 *Hennepin County*

Name *Atty for Nation Wide Insurance*

Street Address *Karen Ms. Lauren Weber of Fellber M. Weber,*

County, City *Fellber M Weber, South 6th Street, Ste 2200*

State & Zip Code *Hennepin, Minneapolis Minnesota, 55401*

*PH: 612-339-6321*

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

Victoria C. Gies

Additional

vs-  
220C, Karen Sykes  
of EEOC, Lori Peterson,  
Robert Prokop, Prokop  
Insurance &  
Nationwide  
Insurance

DEFENDANTS

(e) Defendant No. 4

Lori C. Peterson  
2018 Lori Peterson Law Firm  
222 South 9th Street, Suite 1600  
County: Hennepin, Minneapolis  
State: Minnesota 55402

(f) Defendant No. 5

Robert Prokop & Prokop Insurance  
355 Empire Lane N. Ste 200  
Plymouth, MN 55447

Attorney for Robert Prokop

Charles Keenen, Esq.  
USB Plaza 4444  
Cedar Street, Suite 1111  
ST. PAUL MN 55101

Victoria Charles Gilles  
Lon C. Jefferson, EEOC Karen Symonds et al  
Robert Prokop  
LIST of Additional Defendants

Defendant #3

Name: Robert Prokop & Prokop Insurance  
3155 Empire & Prokop Insurance  
Lane North Ste 200  
Plymouth, MN. 55447  
Attorney for Prokop: Charles E. Keenen, Esq.

USB PLAZA 4444 Cedar Street,  
Suite 1111  
ST. PAUL, MN 55101  
PH: 651-224-0244

Defendant #4

Nation Wide Insurance  
Attorney: Lauren M. Weber  
220 South 6th Street Suite 200,  
Minneapolis, MN 55402  
PH: 612-373-8500  
FAX: 612-338-0535  
EMAIL: lweber@felhaber.com

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Question

☒ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

*exclusive jurisdiction. subject matter jurisdiction. nationwide federal remedy. US Government only is Defendant - US government Agency EEOC & employer default. other state*

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: *Nationwide Insurance*

State of Citizenship: *Tah Heden Remissell*

Defendant No. 1: *Nationwide*

State of Citizenship: *FLORIDA*

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph

5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (check all that apply)

☒ Defendant(s) reside in Minnesota


☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

Signed this 1 day of June 2022

Signature of Plaintiff 

Mailing Address

550 AK Glen Road  
EDINA, MN 55439

Telephone Number

952-250-4769

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

Attached. Steps